



July 2, 2025

VIA ECF

Hon. Katharine H. Parker
U.S. District Court
500 Pearl Street, Room 750
New York, New York 10007

Re: *Sound Around Inc. v. Friedman et al.*
Case No. 1:24-cv-01986-JHR-KHP

Dear Judge Parker:

This firm represents Defendants Moises Friedman, Shulim Eliezer Ilowitz, ML Imports, Inc., CYRF, Inc., LRI Group, LLC, MDF Marketing Inc., and World Group Import, LLC (“Defendants”) in the above-referenced matter. We write in response to Your Honor’s order at the Case Management Conference on June 18, 2025, in which you instructed counsel for the Defendants to provide an update regarding the status of extracting Defendants’ e-mails and WhatsApp communications.

Defendants have been able to obtain and extract Defendants’ e-mails and WhatsApp communications and are presently preparing them for production in their native format with metadata in a forensically-sound manner. We anticipate that we will produce this information to counsel for Plaintiff Sound Around, Inc. by July 9, 2025.

Thank you for your consideration.

Sincerely,

/s/Nicholas Fortuna

Nicholas Fortuna

cc: All counsel (via ECF)

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